

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Latasha Holloway, *et al.*,

Plaintiffs,

v.

City of Virginia Beach, *et al.*,

Defendants

Civil Action No. 2:18-cv-0069

**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

PLAINTIFFS' EXHIBIT 37

Declaration of Simone Leeper

**IN THE UNITED STATES DISTRICT COURT FOR
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Latasha Holloway, *et al.*,

Plaintiffs,

Civil Action No. 2:18-cv-0069

v.

City of Virginia Beach, *et al.*,

Defendants.

DECLARATION OF SIMONE LEEPER

Pursuant to 28 U.S.C. § 1746, I, Simone Leeper, declare that:

1. I am over the age of 18 and competent to testify as to the matters set forth in this declaration based upon my own personal knowledge.
2. I am Simone Leeper, a law fellow at the Campaign Legal Center (CLC). My job responsibilities include reviewing documents produced as part of litigation.
3. For purposes of this litigation, CLC is using the e-discovery software “Relativity” to manage the documents produced by Defendants. All documents produced by Defendants were uploaded to Relativity after they were produced. All of Defendants’ produced documents were marked with Bates stamps in the form DEF XXXXX.

4. In addition, Plaintiffs received documents in response to subpoenas from individuals who were deposed in this case. Those documents were also uploaded to Relativity after they were produced.

5. The following exhibits to the Plaintiffs' Brief in Opposition to Defendants' Motion for Summary Judgment are true and correct copies of documents produced by Defendants:

- a. Exhibit 9: DEF 02188–02190, City Attorney's Letter to Andrew Jackson;
- b. Exhibit 10: DEF 02186, August 23, 2011 Virginia Pilot Article re: 2011 Redistricting;
- c. Exhibit 12: DEF 11619–11632, Excerpt from Virginia Beach Dept. of Agriculture EEO Plan;
- d. Exhibit 13: DEF 11870–11898, Excerpt from Virginia Beach Fire Dept. EEO Plan;
- e. Exhibit 14: DEF 11933–11943, Excerpt from Virginia Beach Dept. of Police EEO Plan;
- f. Exhibit 15: DEF 11552–11568, Excerpt from Virginia Beach EEO Plan;
- g. Exhibit 16: DEF 10609–10613, Excerpt from Virginia Beach Dept. of Housing and Neighborhood Preservation Consolidated Plan;
- h. Exhibit 21: DEF 02158–02183, Transcript of 2001 Redistricting Public Hearing;
- i. Exhibit 23: DEF 07724–07725, February 2017 News Articles re: Minority Community Support for the City to Conduct a Disparity Study;

- j. Exhibit 24: DEF 07790–07791, October 2018 News Articles Reporting on Findings of City’s Disparity Study;
- k. Exhibit 25: DEF 08187, Email from Virginia Beach City Council Member Sabrina Wooten re: Disparity Study Forum;
- l. Exhibit 28: DEF 07750–07751, Email with News Articles re: Faith, Freedom, & Justice March;
- m. Exhibit 29: DEF 08923–08947, Excerpt from Virginia Beach Disparity Study;
- n. Exhibit 33: DEF 12966–12986, Minority Business Council 2006 Annual Report;
- o. Exhibit 20: Excerpt from Virginia Beach City Council Member Jessica Abbott’s Response to Plaintiffs’ Rule 45 Subpoena for Document Production (pgs. 9–25);
- p. Exhibit 26: Excerpt from Virginia Beach City Council Member James Wood’s Response to Plaintiff’s Rule 45 Subpoena for Document Production (pgs. 9–16).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 5, 2019



Simone Leeper